

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

DIGITAL MEDIA SOLUTIONS, LLC,)	CASE NO. 1:19-CV-145
)	
Plaintiff,)	JUDGE DAN AARON POLSTER
)	
v.)	MAGISTRATE JUDGE
)	THOMAS M. PARKER
SOUTH UNIVERSITY OF OHIO, LLC, <i>et al.</i> ,)	
)	
Defendants.)	

MOTION OF STUDIO ENTERPRISE MANAGER, LLC TO INTERVENE

Pursuant to Rule 24 of the Federal Rules of Civil Procedure, Studio Enterprise Manager, LLC, as secured party under the Framework Agreement,¹ hereby moves the Court to intervene in this action. The reasons supporting this Motion are set forth in the accompanying Memorandum in Support. A proposed Order Authorizing Studio Enterprise Manager, LLC to Intervene is attached hereto as Exhibit A.

¹ Capitalized terms used but not defined in this Motion shall have the meaning ascribed to such terms in the accompanying *Memorandum in Support of Studio Enterprise Manager, LLC's Motion to Intervene*, dated February 12, 2019 ("Memorandum"), submitted herewith.

Dated: February 12, 2019

Respectfully submitted,

s/ Scott N. Opincar

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² Covington & Burling LLP attorneys are in the process of collecting good-standing certificates necessary for admission *pro hac vice* and will be filing motions for admission *pro hac vice* once all necessary supporting materials are available to comply with local rules.

Certificate of Service

A copy of the foregoing was served via the Court's Electronic Filing Systems on this February 12, 2019.

s/ Scott N. Opincar
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Counsel for Studio Enterprise Manager, LLC